EXHIBIT 1

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5	Facsimile: (816) 424-1337	
6	Attorneys for Plaintiff DEAN FOLTZ	
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8	UNITED STATES DISTRICT COURT	
9	FOR THE WESTERN DISTRICT OF MISSOURI	
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11	DEAN FOLTZ; individually and on behalf of others similarly situated,	Case No. 2:14-cv-04308-NKL
12	Plaintiffs,	Hon. Nanette L. Laughrey
13	v.	
14	GUITAR CENTER STORES, INC., and	DECLARATION OF STEPHEN GOMEZ REGARDING CLASS NOTICE AND SETTLEMENT ADMINISTRATION
15	DOES 1 through 50, inclusive, Defendants.	
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DECLARATION OF STEPHEN GOMEZ

- I, STEPHEN GOMEZ, declare the following facts to be true and correct and if called as a witness would testify competently to the same:
- 1. I am employed as a Case Manager by Simpluris, Inc. ("Simpluris"), the Claims Administrator in the above-entitled action. Our corporate address is 3176 Pullman Street, Suite 123, Costa Mesa, CA 92626. My telephone number is (714) 640-5657. I am over 21 years of age and authorized to make this declaration on behalf of Simpluris and myself.
- 2. Simpluris is a class action settlement administration company headquartered in Costa Mesa, California. It was founded by individuals who have each managed hundreds of settlements along with professionals in the areas of software development, third-party claims administration, mail-house operations and call center support management.
- 3. Simpluris was appointed by the Court as Settlement Administrator to administer the settlement in accordance with the terms of the Class Action Settlement Agreement. Simpluris has been, and if the Court grants final approval of the Settlement, will be responsible for, among other things: (a) printing and mailing, the Class Notice; (b) receiving undeliverable Class Notices; (c) receiving and validating Requests for Exclusion/Opt Outs; (d) calculating individual settlement payments, distributing funds, and tax-reporting following final approval; (e) mailing settlement checks; (f) answering questions from Class Members; and (g) performing such other tasks necessary to effectuate the terms of the Settlement or as the Parties mutually agree or the Court orders Simpluris to perform.

TOLL FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the

settlement process. Callers have the option to speak with a live call center representative during normal business hours or to leave a message and receive a return call during non-business hours. The toll-free telephone number included in the Class Notice was (888) 836-1441 and was live on September 4, 2015.

NOTIFICATION TO THE CLASS

- 5. On August 10, 2015, Simpluris received the Court-approved Class Notice. The Class Notice advised Class Members of their right to opt out from the Settlement, object to the Settlement, or do nothing, and the implications of each such action. The Class Notice advised Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how Class Members could obtain additional information. A sample Class Notice is attached hereto as **Exhibit A**.
- 6. On August 10, 2015, Counsel for Defendant provided Simpluris with a mailing list ("Class List") containing the name and last known address. The Class List contained data for 3,393 Class Members.
- 7. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal Service. The NCOA contains changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA was utilized in connection with the mailing of the Class Notice Packets.
- 8. On September 4, 2015, after updating the mailing addresses through the NCOA, Class Notice Packets were mailed via First Class Mail to 3,393 Class Members contained in the Class List.
- 9. If a Class Member's Class Notice Packet was returned by the USPS as undeliverable and without a forwarding address, Simpluris performed an advanced address search (i.e. skip trace) on all of these addresses by using Accurint, a reputable research tool owned by Lexis-Nexis.

 Simpluris used the Class Member's name and previous address to locate a current address. Through

the advanced address searches, Simpluris was able to locate 229 updated addresses and Simpluris promptly mailed Class Notice Packets to those updated addresses. Ultimately, there were 210 Class Notices that were undeliverable.

EXCLUSIONS AND OBJECTIONS

- 11. As of December 7, 2015, Simpluris has received 6 Requests for Exclusion from the Settlement from Class Members.
- 12. Class Members who wished to object were directed to file their objection with the Court and serve a copy of the objection on the attorneys for the parties. As December 7, 2015, Simpluris has not received any objections.
- 13. As December 7, 2015, there are 3,387 Class Members who will be paid their portion of the Net Settlement Amount, estimated to be \$57,303.00. The Net Settlement Amount available to pay Class Members was determined by subtracting the Class Representative Enhancement Award (\$5,000.00), the Class Counsel Attorneys' Fees and Costs Payment (\$40,552.00), and the Settlement Administration costs (\$20,000.00) from the Maximum Settlement Fund (\$122,855.00).
- 14. Class Members who did not Opt Out from Settlement will receive an equal share of the Net Settlement Amount in the amount of \$16.92.

ADMINISTRATION COSTS

15. Simpluris' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are \$20,000.00. Simpluris' work in connection with this matter will continue with the calculation of the settlement checks, issuance and mailing of those settlement checks, etc., and to do the necessary tax reporting on such payments.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7 day of December, 2015, in Costa Mesa, CA.

Stephen Gomez